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 9 REGAL STONE, LIMITED, FLEET MANAGEMENT, LTD.,  
 10 and M/V COSCO BUSAN

11 **UNITED STATES DISTRICT COURT**  
 12 **NORTHERN DISTRICT OF CALIFORNIA**

14 CHELSEA, LLC, MARK RUSSO, and ) Case No. C-07-5800-SC  
 15 ALLEN LORETZ, individually and on )  
 15 behalf of all others similarly situated, ) AT LAW AND IN ADMIRALTY  
 16 Plaintiff, )  
 16 ) **STIPULATION OF PLAINTIFFS AND**  
 17 vs. )  
 17 ) **DEFENDANTS REGAL STONE**  
 18 REGAL STONE, LTD., HANJIN )  
 18 SHIPPING CO., LTD., SYNERGY )  
 19 MARITIME, LTD, FLEET )  
 19 MANAGEMENT, LTD, and JOHN COTA, )  
 20 *In Personam*; M/V COSCO BUSAN, their )  
 20 engines, tackle, equipment, )  
 21 appurtenances, freights, and cargo *In Rem*, )  
 21 )  
 22 Defendant. )  
 22 )

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 26  
 27  
 28 STIPULATION OF PLAINTIFFS AND DEFENDANTS REGAL STONE LIMITED, FLEET  
 MANAGEMENT LTD., AND M/V COSCO BUSAN TO EXTEND THE TIME FOR FILING AND  
 SERVICE OF A RESPONSE TO PLAINTIFFS' VERIFIED SECOND AMENDED CLASS ACTION  
 COMPLAINT AND PROPOSED ORDER - Case No. C-07-5800-SC

1                   **TO THE COURT AND ALL COUNSEL OF RECORD:**

2                   **IT IS HEREBY STIPULATED** by and between Plaintiffs CHELSEA, LLC,  
 3 MARK RUSSO, and ALLEN LORETZ ("Plaintiffs") and Defendants REGAL STONE  
 4 LIMITED, FLEET MANAGEMENT, LTD., and M/V COSCO BUSAN *in rem*  
 5 ("Defendants"), through their respective counsel of record, that the time for Defendants  
 6 to file and serve a response to Plaintiffs' Verified Second Amended Class Action  
 7 Complaint is further extended by fourteen (14) days. Defendants will file and serve  
 8 their responses to Plaintiffs' Verified Second Amended Class Action Complaint no later  
 9 than Friday, September 19, 2008.

10                  This stipulation is not entered into for purposes of delay, but to permit Defendants  
 11 to continue their investigation, to address the new allegations contained in Plaintiff's  
 12 Verified Second Amended Class Action Complaint, and to allow Defendants to formulate  
 13 a proper response.

14                  **IT IS SO STIPULATED AND AGREED.**

16                  DATED: September 5, 2008

AUDET & PARTNERS, LLP

17                  By: /s/ William M. Audet  
 18                    WILLIAM M. AUDET  
 19                    Attorney for Plaintiffs  
 20                    CHELSEA, LLC, MARK RUSSO  
                       and ALLEN LORETZ

21                  DATED: September 5, 2008

KEESAL, YOUNG & LOGAN

23                  By: /s/ Julie L. Taylor  
 24                    JOHN D. GIFFIN  
 25                    JOSEPH A. WALSH II  
 26                    JULIE L. TAYLOR  
                       ANNE M. MORIARTY

27                    Attorneys for Defendants  
 28                    REGAL STONE LIMITED, FLEET  
                       MANAGEMENT LTD., and M/V  
                       COSCO BUSAN

## ORDER

Based on the foregoing Stipulation, IT IS HEREBY ORDERED that the time for Defendants REGAL STONE LIMITED, FLEET MANAGEMENT, LTD., and M/V COSCO BUSAN *in rem* ("Defendants") to file and serve a response to the Verified Second Amended Class Action Complaint of Plaintiffs CHELSEA, LLC, MARK RUSSO, and ALLEN LORETZ is extended by fourteen (14) days. Defendants are ordered to file and serve their responses to Plaintiffs' Verified Second Amended Class Action Complaint no later than Friday, September 19, 2008.

**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

DATED: 9/8/08

